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May 7, 2024

VIA ECF

Honorable Katharine H. Parker
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 17D
New York, New York 10007

Re: Arlene Delgado v. Donald J. Trump for President, Inc., et al.
Civil Action No. 19-cv-11764 (AT) (KHP)

Dear Judge Parker:

We represent defendants Donald J. Trump for President, Inc., Sean Spicer, and Reince Priebus in the above-captioned action and are writing, in accordance with Your Honor's April 24, 2024 order (the "April 24th Order"), to provide the Court with a status regarding the completion of discovery. ECF Doc. No. 265.

Defendants' remaining court-ordered discovery obligations were set forth in the April 24th Order, which directed them to (i) contact defendants' predecessor counsel concerning a specific document sought by plaintiff, (ii) provide information concerning any gender-related complaints made against the Campaign during the 2016 and 2020 election cycles, and (iii) identify the Campaign's Human Resources Directors from 2015 through 2020.

These items have all been fully addressed, as set forth below:

- For item (i), we contacted defendants' predecessor counsel on April 30, 2024, which confirmed that the specific document sought by plaintiff has already been produced to her. We confirmed this finding with plaintiff on April 30th.
- For item (ii), the Campaign—with the assistance of its e-discovery vendor 2M—conducted general and specific searches through its entire server and produced to plaintiff all

responsive documents that were located regarding gender-based complaints on May 7th.¹

- For item (iii), the Campaign—with the assistance of 2M—identified who we understand was the Campaign’s primary Human Resources representative during the 2020 election cycle and provided that information to plaintiff on May 7th.

As for remaining discovery, plaintiff has (i) noticed certain non-party depositions that have not yet been completed, and (ii) served contention interrogatories on the individual defendants that will be responded to in the ordinary course. Aside from these remaining items, it is the Campaign’s position that discovery in this matter is complete.

Respectfully submitted,

Jared E. Blumetti

Patrick McPartland
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¹ The Campaign initially offered to provide this information through a continued Rule 30(b)(6) deposition. On May 1st, we advised plaintiff that the Campaign’s 30(b)(6) witness was available to testify regarding these matters on either May 6th or May 7th, but plaintiff represented that she was unavailable on both dates (and did not propose any alternative dates). Plaintiff then proposed that we produce the documents in lieu of the deposition, which we did.